

JUSTIN M. BAXTER

Oregon State Bar ID Number 99217

justin@baxterlaw.com

Baxter & Baxter LLP

8835 S.W. Canyon Lane, Suite 130

Portland, Oregon 97225

Telephone (503) 297-9031

Facsimile (503) 291-9172

Attorney for Plaintiff April Hettman

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PORTLAND DIVISION

APRIL HETTMAN,
formerly April Manning,

Plaintiff,

v.

EQUIFAX INFORMATION SERVICES LLC,
a foreign limited liability company, TRANS
UNION LLC, a foreign limited liability company,

Defendants.

Case No. CV 08-1174-AC

PLAINTIFF'S MOTION FOR
SANCTIONS

Fed. R. Civ. Proc. 37

(Oral Argument Requested)

CERTIFICATION

Pursuant to LR 7.1, counsel for plaintiff certifies that the parties made a good faith effort through telephone conference to resolve the dispute and have been unable to do so.

MOTION

Plaintiff April Hettman moves, pursuant to Fed. R. Civ. Proc. 37 for an order of sanctions against defendant Equifax Information Services, LLC. This motion is supported by the

memorandum in support, declaration and exhibits filed herewith.

DATED this 4th day of June, 2010.

/s/ Justin M. Baxter

Justin M. Baxter, OSB #99217
justin@baxterlaw.com
(503) 297-9031 (Telephone)
(503) 291-9172 (Facsimile)
Of Attorney for Plaintiff April Hettman

CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing PLAINTIFF'S MEMORANDUM IN
SUPPORT OF MOTIN FOR SANCTIONS on:

Jeffrey M. Edelson
Markowitz, Herbold, Glade & Mehlhaf, P.C.
Suite 3000 Pacwest Center
1211 SW Fifth Avenue
Portland, OR 97204

Ann Broussard
King & Spalding, LLP
1180 Peachtree Street, NE
Atlanta, GA 30309-3521

Counsel for Defendant Equifax Information Services, LLC

☒ [X] Via First Class Mail

☐ [] Via Hand Delivery

☐ [] Via Email (CM/ECF)

DATED this 4th day of June, 2010.

/s/ Justin M. Baxter

Justin M. Baxter, OSB #99217
justin@baxterlaw.com
(503) 297-9031 (Telephone)
(503) 291-9172 (Facsimile)
Of Attorney for Plaintiff April Hettman